JS 44 (Rev. 07/16)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. *(SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)*

I. (a) PLAINTIFFS
RICHARD T. ARMSTRONG

(b) County of Residence of First Listed Plaintiff CHESTER
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys *(Firm Name, Address, and Telephone Number)*
LAW OFFICE OF MICHAEL P. FORBES, PC, 200 EAGLE ROAD, SUITE 50, WAYNE, PA 19087 610-293-9399

DEFENDANTS
J.A. CAMBECE LAW OFFICE, PC

County of Residence of First Listed Defendant ESSEX
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys *(If Known)*

II. BASIS OF JURISDICTION *(Place an "X" in One Box Only)*

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question *(U.S. Government Not a Party)*
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity *(Indicate Citizenship of Parties in Item III)*

III. CITIZENSHIP OF PRINCIPAL PARTIES *(Place an "X" in One Box for Plaintiff and One Box for Defendant)*
(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	☐ 1	☐ 1	Incorporated *or* Principal Place of Business In This State	☐ 4	☐ 4
Citizen of Another State	☐ 2	☐ 2	Incorporated *and* Principal Place of Business In Another State	☐ 5	☐ 5
Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 6

IV. NATURE OF SUIT *(Place an "X" in One Box Only)*

CONTRACT
- ☐ 110 Insurance
- ☐ 120 Marine
- ☐ 130 Miller Act
- ☐ 140 Negotiable Instrument
- ☐ 150 Recovery of Overpayment & Enforcement of Judgment
- ☐ 151 Medicare Act
- ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans)
- ☐ 153 Recovery of Overpayment of Veteran's Benefits
- ☐ 160 Stockholders' Suits
- ☐ 190 Other Contract
- ☐ 195 Contract Product Liability
- ☐ 196 Franchise

REAL PROPERTY
- ☐ 210 Land Condemnation
- ☐ 220 Foreclosure
- ☐ 230 Rent Lease & Ejectment
- ☐ 240 Torts to Land
- ☐ 245 Tort Product Liability
- ☐ 290 All Other Real Property

TORTS

PERSONAL INJURY
- ☐ 310 Airplane
- ☐ 315 Airplane Product Liability
- ☐ 320 Assault, Libel & Slander
- ☐ 330 Federal Employers' Liability
- ☐ 340 Marine
- ☐ 345 Marine Product Liability
- ☐ 350 Motor Vehicle
- ☐ 355 Motor Vehicle Product Liability
- ☐ 360 Other Personal Injury
- ☐ 362 Personal Injury - Medical Malpractice

PERSONAL INJURY
- ☐ 365 Personal Injury - Product Liability
- ☐ 367 Health Care/ Pharmaceutical Personal Injury Product Liability
- ☐ 368 Asbestos Personal Injury Product Liability

PERSONAL PROPERTY
- ☐ 370 Other Fraud
- ☐ 371 Truth in Lending
- ☐ 380 Other Personal Property Damage
- ☐ 385 Property Damage Product Liability

CIVIL RIGHTS
- ☐ 440 Other Civil Rights
- ☐ 441 Voting
- ☐ 442 Employment
- ☐ 443 Housing/ Accommodations
- ☐ 445 Amer. w/Disabilities - Employment
- ☐ 446 Amer. w/Disabilities - Other
- ☐ 448 Education

PRISONER PETITIONS

Habeas Corpus:
- ☐ 463 Alien Detainee
- ☐ 510 Motions to Vacate Sentence
- ☐ 530 General
- ☐ 535 Death Penalty

Other:
- ☐ 540 Mandamus & Other
- ☐ 550 Civil Rights
- ☐ 555 Prison Condition
- ☐ 560 Civil Detainee - Conditions of Confinement

FORFEITURE/PENALTY
- ☐ 625 Drug Related Seizure of Property 21 USC 881
- ☐ 690 Other

LABOR
- ☐ 710 Fair Labor Standards Act
- ☐ 720 Labor/Management Relations
- ☐ 740 Railway Labor Act
- ☐ 751 Family and Medical Leave Act
- ☐ 790 Other Labor Litigation
- ☐ 791 Employee Retirement Income Security Act

IMMIGRATION
- ☐ 462 Naturalization Application
- ☐ 465 Other Immigration Actions

BANKRUPTCY
- ☐ 422 Appeal 28 USC 158
- ☐ 423 Withdrawal 28 USC 157

PROPERTY RIGHTS
- ☐ 820 Copyrights
- ☐ 830 Patent
- ☐ 840 Trademark

SOCIAL SECURITY
- ☐ 861 HIA (1395ff)
- ☐ 862 Black Lung (923)
- ☐ 863 DIWC/DIWW (405(g))
- ☐ 864 SSID Title XVI
- ☐ 865 RSI (405(g))

FEDERAL TAX SUITS
- ☐ 870 Taxes (U.S. Plaintiff or Defendant)
- ☐ 871 IRS—Third Party 26 USC 7609

OTHER STATUTES
- ☐ 375 False Claims Act
- ☐ 376 Qui Tam (31 USC 3729(a))
- ☐ 400 State Reapportionment
- ☐ 410 Antitrust
- ☐ 430 Banks and Banking
- ☐ 450 Commerce
- ☐ 460 Deportation
- ☐ 470 Racketeer Influenced and Corrupt Organizations
- ☐ 480 Consumer Credit
- ☐ 490 Cable/Sat TV
- ☐ 850 Securities/Commodities/ Exchange
- ☒ 890 Other Statutory Actions
- ☐ 891 Agricultural Acts
- ☐ 893 Environmental Matters
- ☐ 895 Freedom of Information Act
- ☐ 896 Arbitration
- ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
- ☐ 950 Constitutionality of State Statutes

V. ORIGIN *(Place an "X" in One Box Only)*

☐ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District *(specify)* ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing ***(Do not cite jurisdictional statutes unless diversity)***:
15 O.S.C. SECTIONS 1692-1692P

Brief description of cause:
VIOLATIONS OF FAIR DEBT COLLECTION PRACTICES ACT

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND $

CHECK YES only if demanded in complaint:
JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE 03/06/2017 SIGNATURE OF ATTORNEY OF RECORD [signature]

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 945 CROTON ROAD, WAYNE, PA 19087

Address of Defendant: 200 CUMMINGS CENTER, SUITE 173D, BEVERYLY, MA 01915

Place of Accident, Incident or Transaction: ____________________

(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?
(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a)) Yes☐ No☒

Does this case involve multidistrict litigation possibilities? Yes☐ No☒

RELATED CASE, IF ANY:

Case Number: ____________ Judge ____________ Date Terminated: ____________

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?
Yes☐ No☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?
Yes☐ No☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court? Yes☐ No☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?
Yes☐ No☒

CIVIL: (Place ✔ in ONE CATEGORY ONLY)

A. *Federal Question Cases:*

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☒ All other Federal Question Cases
(Please specify) FDCPA 15 U.S.C. SEction 1692

B. *Diversity Jurisdiction Cases:*

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☐ All other Diversity Cases
(Please specify) ____________

ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, Michael Forbes, counsel of record do hereby certify:

☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of $150,000.00 exclusive of interest and costs;

☐ Relief other than monetary damages is sought.

DATE: March 6, 2017 [signature] Attorney-at-Law 55767 Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: March 6, 2017 [signature] Attorney-at-Law 55767 Attorney I.D.#

CIV. 609 (5/2012)

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CASE MANAGEMENT TRACK DESIGNATION FORM

RICHARD T. ARMSTRONG	:	CIVIL ACTION
v.	:	
J.A. CAMBECE LAW OFFICE, PC	:	
And CACH, LLC	:	NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

(a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )

(b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )

(c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ( )

(d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )

(e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )

(f) Standard Management – Cases that do not fall into any one of the other tracks. (X)

MARCH 6, 2017	MICHAEL P. FORBES, ESQUIRE	PLAINTIFF
Date	**Attorney-at-law**	**Attorney for**
610-293-9399	610-293-9388	MICHAEL@MFORBESLAW.COM
Telephone	**FAX Number**	**E-Mail Address**

(Civ. 660) 10/02

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RICHARD T. ARMSTRONG	)	
Plaintiff	)	**NO.**
v.	)	
J.A. CAMBECE LAW OFFICE, P.C.	)	
And	)	**JURY TRIAL DEMANDED**
CACH, LLC	)	

I. JURISDICTION AND VENUE

1. Jurisdiction of this Court arises out of Defendants' violations of the Fair Debt Collection Practices Act, 15 U.S.C. section 1692 *et seq* (hereinafter "FDCPA") which prohibits debt collectors from engaging in abusive, false, deceptive, misleading and unfair practices.

2. Venue is proper in this District because Defendants transact business within this District, the acts and transactions occurred in this District, and Plaintiff resides in this District.

II. PARTIES

3. Plaintiff, Richard T. Armstrong, (hereinafter "Plaintiff") is a natural person residing at 945 Croton Road, Wayne, PA 19087. Because Plaintiff is allegedly obligated to pay a debt, that is the subject of this case was primarily used for family, personal or household purposes, namely a credit card, he is a consumer within the meaning of FDCPA, 15 U.S.C. § 1692a(3).

4. Defendant, J.A. Cambece Law Office P.C. (hereinafter "Cambece" or "Defendant") is, upon information and belief, a professional corporation whose address is listed as 200 Cummings Center, Suite 173D, Beverly, MA 01915 and, at all times relevant herein and is a "debt collector"

as the term is defined by 15 U.S.C. § 1692a(6), who acted by and through its owners, managers, officers, shareholders, authorized representatives, partners, employees, agents and/or workmen and acted on behalf of Defendant, CACH, LLC.

5. Defendant, CACH, LLC is, upon information and belief, a limited liability corporation with an address of 200 Cummings Center, Suite 173D, Beverly, MA 01915 and, at all times relevant herein and is a "debt collector" as the term is defined by 15 U.S.C. § 1692a(6), who acted by and through its owners, managers, officers, shareholders, authorized representatives, partners, employees, agents, attorneys and/or workmen and Defendant, J.A. Gambece Law Office P.C.

6. Defendants, at all times relevant hereto, are considered persons who used an instrumentality of interstate commerce or the mails in a business the principal purpose of which was the collection of debts, who regularly collected or attempted to collect, directly or indirectly, debts owed or due asserted to be owed or due another, and/or who, in the process of collecting its own debts, used a name other than its own which would indicate that a third person was collecting or attempting to collect such debts.

7. At all times material and relevant hereto, Defendants are jointly, severally, individually, vicariously and/or equitably liable to Plaintiff.

8. At all pertinent times, Defendant Cambece was hired by Defendant CACH, LLC and was acting on behalf of LVNV to collect moneys relating to a consumer credit card that was allegedly owed by Plaintiff.

III. FACTUAL ALLEGATIONS

9. On August 15, 2016, Defendant, CACH, LLC by and through its attorney, Defendant Cambece, filed a Civil Complaint in Chester County Magisterial District Court number 15-4-01

against Plaintiff, case no. CV-123-16. A true and correct copy of the aforestated Complaint is attached hereto as Exhibit "A."

10. Plaintiff was, subsequently, served with the Complaint.

11. As a result of Defendants' filing of the Complaint, Plaintiff hired the undersigned counsel to represent him.

12. On November 9, 2016, a hearing was held and Plaintiff presented an oral Motion to Dismiss the Complaint due to the fact that the case was filed in the wrong venue.

13. The Court granted Plaintiff's Motion and, as a result, Defendants' Complaint was dismissed without prejudice. A true and correct copy of the November 9, 2016 Notice of Judgment/Transcript is attached hereto as Exhibit "B."

14. At the time of the filing of the aforesaid Complaint by Defendants, Plaintiff did not reside in Chester County, Pennsylvania, nor was a party to any contract or transaction alleged by Defendants in Chester County, Pennsylvania.

15. As a result of the Defendants' filing in an improper venue, Plaintiff incurred legal fees.

IV. CAUSES OF ACTION

COUNT I
VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT
15 U.S.C. section 1692, et seq.

16. Plaintiff incorporates his allegations of paragraphs 1 through 18 as though set forth at length herein.

17. Defendants' aforestated actions violated the FDCPA as follows:

(a) Defendants violated 15 U.S.C. § 1692f by using unfair and unconscionable means to attempt to collect Plaintiff's alleged debt;

(b) Defendants violated 15 U.S.C. § 1692i(a)(2) by bringing a legal action in a location other then where the contract was signed or where the consumer lives.

18. As a direct and proximate result of the Defendants' illegal collection efforts, Plaintiff has suffered damages in the form of attorney's fees, costs and expenses.

19. As a direct and proximate result of Defendants' illegal collection efforts and communications, Plaintiff has suffered mental anguish, emotional distress, anger, anxiety, and frustration, fear, embarrassment and humiliation.

20. Plaintiff has been seriously damaged by Defendants' violations of the FDCPA and is entitled to actual damages, compensatory damages, costs and attorneys fees.

21. As a result of the foregoing violations of the FDCPA, Defendants are liable to Plaintiff for actual damages, statutory damages, attorney's fees and costs in accordance with 15 U.S.C. § 1692k.

CLAIMS FOR RELIEF

22. Plaintiff incorporates by reference paragraphs 1 through 24 of this Complaint as though fully set forth herein.

23. The foregoing acts and omissions of Defendants constitute numerous and multiple violations of the FDCPA including but not limited to each and every one of the above-cited provisions of the FDCPA, 15 U.S.C. § 1692, et seq.

24. As a result of each of Defendants' violations of the FDCPA, Plaintiff is therefore entitled to actual damages pursuant to 15 U.S.C. §1692k(a)(1); statutory damages in amount up to $1,000.00 pursuant to 15 U.S.C. § 1692k(a)(2)(A); and, reasonable attorney's fees and costs pursuant to 15 U.S.C. § 1692k(a)(3) from each and every Defendant herein.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, Richard T. Armstrong, prays that judgment be entered against Defendants, individually, jointly and severally, for the following:

(1) Actual damages;

(2) Statutory damages in the amount of $1,000.00;

(3) Reasonable attorney's fees and costs;

(4) Declaratory judgment that the Defendants' conduct violated the FDCPA;

(5) Such other and further relief that the Court deems just and proper.

COUNT II
VIOLATIONS OF PENNSYLVANIA FAIR CREDIT EXTENSION UNIFORMITY ACT
(FCEUA, 73 Pa. C.S § 2270.1, et. seq.

25. Plaintiff incorporates his allegations of paragraphs 1 through 30 as though set forth at length herein.

26. Defendants violated FCEUA, 73 P.S. § 2270.4(a), because any violation of FDCPA by a debt collector, as set forth above, constitutes an unfair or deceptive debt collection act or practice under FCEUA.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, Richard T. Armstrong, prays that judgment be entered against Defendants, individually, jointly and severally, for the following:

(1) An Order declaring that Defendants violated the FCEU;

(2) Actual damages;

(3) Treble damages;

(4) Reasonable attorney's fees and costs;

(5) Such other and further relief that the Court deems just and proper.

COUNT III
VIOLATIONS OF PENNSYLVANIA UNFAIR TRADE CONSUMER PROTECTION LAW
("UTCPL"), 73 Pa. C.S § 201-1, et. seq.

27. Plaintiff incorporates her allegations of paragraphs 1 through 29 as though set forth at length herein.

28. Defendants violated UTPCPL, because, pursuant to FCEUA, 73 P.S. § 2270.5(a), any unfair or deceptive debt collection act or practice under FCEUA by a debt collector or credit, as set forth above, constitutes a violation of UTPCPL.

29. Other unfair or deceptive acts or practices defined as such in 73 P.S. §201-2(4) committed by Defendants include, but are not limited to, the following:

a. Defendants engaged in fraudulent or deceptive conduct which would create the likelihood of confusion or of misunderstanding.

30. Pursuant to UTPCPL, 73 P.S. § 201-3, such acts and practices are unlawful.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, Richard T. Armstrong, prays that judgment be entered against Defendants, individually, jointly and severally, for the following:

(1) An Order declaring that Defendants violated the UTCPL

(2) Actual damages;

(3) Treble damages;

(4) Reasonable attorney's fees and costs;

(5) Such other and further relief that the Court deems just and proper.

V. DEMAND FOR JURY TRIAL

Plaintiff is entitled to and hereby respectfully demands a trial by jury. US Const. amend. 7.Fed.R.Civ.P.38.

Respectfully submitted,

Mpf8441/s/*Michael P. Forbes*

Law Office of Michael P. Forbes, P.C.
By: Michael P. Forbes, Esquire
Attorney for Plaintiff
Attorney I.D.#55767
200 Eagle Road
Suite 220
Wayne, PA 19087
(610 293-9399
(610)293-9388 (Fax)
michael@mforbeslaw.com

EXHIBIT A

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: Chester

CIVIL COMPLAINT

Magisterial District Number: 15-4-01
MDJ Name: Hon. Analisa S. Sondergaard
Address: Chesterbrook Blvd.
Telephone: (610) 647-6533

PLAINTIFF: NAME and ADDRESS

CACH, LLC
200 CUMMINGS CENTER, SUITE 173D
BEVERLY, MA 01915
866-859-4139

VS.

DEFENDANT: NAME and ADDRESS

RICHARD T ARMSTRONG; 945 Croton Rd, Wayne PA 19087

Docket No.: CV-123-16
Date Filed: 8/15/16

	AMOUNT	DATE PAID
FILING COSTS	$ ~~127.53~~ 121.00	8/15/16
POSTAGE	$ 6.53	8/15/16
SERVICE COSTS	$	
CONSTABLE ED.	$	
TOTAL	$ ~~0.00~~ 127.53	8/15/16

Social security numbers and financial information (e.g. PINS) should not be listed. If the identity of an account number must be established, list only the last four digits. 204 Pa.Code §§ 213.1 - 213.7.

Pa.R.C.P.M.D.J. No. 206 sets forth those costs recoverable by the prevailing party.

TO THE DEFENDANT: The above named plaintiff(s) asks judgment against you for $ 2,429.63 together with costs upon the following claim (Civil fines must include citation of the statute or ordinance violated):

On or around 10/10/2008, Defendant applied for and was subsequently approved and issued a certain Credit Card with Bank of America, N.A., Account No. (Last Four Digits) XXXXXXXX0385, "the Account". By opening said account, Credit Grantor & Defendant entered into a relationship of Debtor & Creditor. The Defendant used the Account for the purchases of goods, merchandise, and/or services. In accordance with established business practice, the Credit Grantor rendered bills and statements of the Account to the Defendant on a monthly basis. The Defendant failed to respond to any of the bills and statements in a reasonable time. By not rejecting within a reasonable amount of time, Defendant manifested an assent to pay the sum asserted on said bills and statements of the Account. Although the Defendant manifested an assent to pay the sum asserted, Defendant failed or neglected to do so. Plaintiff is successor-in-interest to Defendant's obligation in this matter; Plaintiff having purchased and been assigned the Account. The Defendant used the Account, and made payments on the Account until 8/6/2012. As result of the Defendant's default, the Defendant is indebted to the Plaintiff in the amount of $2429.63. Wherefore, Plaintiff requests Judgment against the Defendant(s) for the sum of $2429.63, plus Court Costs.

I, Michael K Williams (322035) **verify that the facts set forth in this complaint are true and correct to the best of my knowledge, information, and belief. This statement is made subject to the penalties of Section 4904 of the Crimes Code (18 PA. C.S. § 4904) related to unsworn falsification to authorities.**

(Signature of Plaintiff or Authorized Agent)

The plaintiff's attorney shall file an entry of appearance with the magisterial district court pursuant to Pa.R.C.P.M.D.J. 207.1.

IF YOU INTEND TO ENTER A DEFENSE TO THIS COMPLAINT, YOU SHOULD SO NOTIFY THIS OFFICE IMMEDIATELY AT THE ABOVE TELEPHONE NUMBER. YOU MUST APPEAR AT THE HEARING AND PRESENT YOUR DEFENSE. UNLESS YOU DO, JUDGMENT MAY BE ENTERED AGAINST YOU BY DEFAULT.

If you have a claim against the plaintiff which is within magisterial district judge jurisdiction and which you intend to assert at the hearing, you must file it on a complaint form at this office at least five (5) days before the date set for the hearing.

If you are disabled and require a reasonable accommodation to gain access to the Magisterial District Court and its services, please contact the Magisterial District Court at the above address or telephone number. We are unable to provide transportation.

"A"

EXHIBIT B

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CHESTER

NOTICE OF JUDGMENT/TRANSCRIPT CIVIL CASE

CACH, LLC
v.
Richard T. Armstrong

Mag. Dist. No:	MDJ-15-4-01
MDJ Name:	Honorable Analisa Sondergaard
Address:	Chesterbrook Shopping Center 500 Chesterbrook Blvd., Suite B3 Wayne, PA 19087
Telephone:	610-647-6533

Michael P. Forbes, Esq.
Law Offices of Michael P Forbes PC
200 Eagle Rd Ste 50
Wayne, PA 19087-3115

Docket No: MJ-15401-CV-0000123-2016
Case Filed: 8/15/2016

Disposition Details

Disposition Summary (cc - Cross Complaint)

Docket No	Plaintiff	Defendant	Disposition	Disposition Date
MJ-15401-CV-0000123-2016	CACH, LLC	Richard T. Armstrong	Dismissed Without Prejudice	11/09/2016

ANY PARTY HAS THE RIGHT TO APPEAL WITHIN 30 DAYS AFTER THE ENTRY OF JUDGMENT BY FILING A NOTICE OF APPEAL WITH THE PROTHONOTARY/CLERK OF COURT OF COMMON PLEAS, CIVIL DIVISION. YOU MUST INCLUDE A COPY OF THIS NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH YOUR NOTICE OF APPEAL.

EXCEPT AS OTHERWISE PROVIDED IN THE RULES OF CIVIL PROCEDURE FOR MAGISTERIAL DISTRICT JUDGES, IF THE JUDGMENT HOLDER ELECTS TO ENTER THE JUDGMENT IN THE COURT OF COMMON PLEAS, ALL FURTHER PROCESS MUST COME FROM THE COURT OF COMMON PLEAS AND NO FURTHER PROCESS MAY BE ISSUED BY THE MAGISTERIAL DISTRICT JUDGE.

UNLESS THE JUDGMENT IS ENTERED IN THE COURT OF COMMON PLEAS, ANYONE INTERESTED IN THE JUDGMENT MAY FILE A REQUEST FOR ENTRY OF SATISFACTION WITH THE MAGISTERIAL DISTRICT JUDGE IF THE JUDGMENT DEBTOR PAYS IN FULL, SETTLES, OR OTHERWISE COMPLIES WITH THE JUDGMENT.

11/9/16
Date

Analisa Sondergaard
Magisterial District Judge Analisa Sondergaard

I certify that this is a true and correct copy of the record of the proceedings containing the judgment.

Date ____________ Magisterial District Judge ____________

"B"

CACH, LLC
v.
Richard T. Armstrong

Docket No.: MJ-15401-CV-0000123-2016

Participant List

Private(s)

Michael P. Forbes, Esq.
Law Offices of Michael P Forbes PC
200 Eagle Rd Ste 50
Wayne, PA 19087-3115

Michael Kevin Williams, Esq.
JA Cambece Law Office PC
200 Cummings Ctr Ste 173 D
Beverly, MA 01915

Plaintiff(s)

CACH, LLC
200 Cummings Center, Suite 173D
Beverly, MA 01915

Defendant(s)

Richard T. Armstrong
945 Croton Rd
Wayne, PA 19087